



U.S. Department of Justice

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District of New Jersey*

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October 10, 2018

Honorable John Michael Vazquez
United States District Judge
Frank R. Lautenberg U.S. Post Office & Courthouse
2 Federal Square
Newark, New Jersey 07102

Re: *United States of America v. All Funds In The Accounts Of Blue Sea Business Co., LTD., Fanwell, LTD., Fully Max Trading, LTD., Dandong Hongxiang Industrial Development Co., LTD., and Success Target Group, LTD. at China Merchants Bank et al., Civil Action No. 16-05903 (JMV)*

Dear Judge Vazquez:

Please accept this submission in response to the October 3, 2018 order requesting that counsel file a letter as to the status of the proceedings in the above-captioned matter.

By way of background, a criminal action involving allegations closely related to the bases for forfeiture asserted in this civil forfeiture action is still on-going in this district. *See United States v. Development Co., LTD, et al., 2:16-mj-6602 (JAD)*. Additionally, because the assets that are the subject of the verified complaint in the above-captioned case are located in China, the United States requires Chinese assistance in seizing and forfeiting those assets. To that end, on August 8, 2016, the United States submitted a Mutual Legal Assistance Agreement (“MLAA”) request to the Chinese Central Authority, which requested, *inter alia*, that the Chinese Central Authority seize up to \$247,966,612.91 in assets from the 25 bank accounts located in China that are the subject of the above-captioned verified complaint for forfeiture in rem. A supplemental MLAA request was sent to the Chinese Central Authority on March 30, 2017. The United States’ requests to the Chinese Central Authority remain outstanding.

In light of both the pendency of the MLAA requests and the related criminal case, the instant case should remain open for at least the near future. The United States respectfully requests that the case remain open because

both the related criminal case and the outstanding requests for assistance bear on the above-captioned civil forfeiture case. Should the Court require periodic status updates, the government will submit status letters to apprise the Court of any developments in the case.

Respectfully yours,

CRAIG CARPENITO
United States Attorney

s/ Sarah Devlin

By: SARAH DEVLIN
Assistant U.S. Attorney